

SANTA MONICA MOUNTAINS CONSERVANCY

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September 26, 2005

Ms. Hsiao-ching Chen
County of Los Angeles
Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

**Notice of Consultation for Conditional Use Permit and Oak Tree
Permit No. 02-053 for Recreational Vehicle and Boat Storage
Facility, 22200 North Sierra Highway, Sylmar,
Los Angeles River Watershed**

Dear Ms. Chen:

The Santa Monica Mountains Conservancy (Conservancy) has reviewed the Initial Study (IS) for the Conditional Use Permit (CUP), Zone Change (ZC), and Oak Tree Permit (OTP) No. 02-053 for a recreational vehicle and boat storage facility at 22200 North Sierra Highway. According to the IS, a Mitigated Negative Declaration is proposed for the project. The project site is located in an area with highly sensitive biological and visual resources, and the project is not compatible with those resources on and around the site. Given these constraints, there is no justification for a zone change on the subject site. The Conservancy recommends that the project be made smaller, and that mitigation measures be required for the project, including an open space dedication, to offset significant adverse biological and visual impacts. Otherwise, an Environmental Impact Report (EIR) should be prepared for the project. The California Environmental Quality Act (CEQA) document should also analyze an "existing zoning" alternative.

On the approximately 28.65-acre site, 193 spaces would be created for the recreational vehicle and boat storage facility. A trailer would be used as the caretaker's residence, and a fence would be installed around the storage area. There would be a zone change for the southern portion (8.24 acres) from A-2-1 to M-1-DP to allow the facility. Thirty-one oak trees would be removed, and there would be encroachments on seven oaks. Four acres (out of 15.84 acres) of coastal sage scrub would be removed. The IS (p. 11) states that approximately 30 percent of the site will be graded.

In several categories of biota, impacts are considered "potentially significant" (IS, p. 11). As the IS states (p. 11), the project is within a "choke" point of linkage between the San

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Gabriel Mountains and Santa Susana Mountains. The CEQA document should address impacts to the this chokepoint, particularly along the wildlife linkage from the inside of the "v" where the 5 Freeway and the Antelope Valley Freeway intersect, to the east side of the Antelope Valley Freeway. This crossing would occur via the Sierra Highway underpass. The project should be modified to ensure that a wildlife linkage is preserved in this area. The CEQA document should also address the impacts of fencing and lighting on wildlife movement.

The CEQA document should also demonstrate avoidance and mitigation for impacts to oak trees and coastal sage scrub. Coastal sage scrub is considered a very threatened natural community by California Department of Fish and Game.

The IS (p. 15) also states that the site is substantially visible from Freeway 14, which is a second priority scenic route, and potentially significant impacts would result. It is unlikely that a revegetation/landscape plan can reduce those impacts to a less-than-significant level. Again, the project should be reduced in size to minimize those adverse impacts to visual resources.

Given the sensitivity of the area, the CEQA document should require an open space fee title dedication over any ungraded open space to an entity capable of managing open space for protection of natural resources. Mountains Recreation and Conservation Authority would be an appropriate entity to accept this dedication.

To summarize, the Conservancy recommends a reduced project for the reasons outlined above. Also, mitigation measures must be required for the project, including an open space dedication, to offset significant adverse biological and visual impacts. Otherwise, an EIR should be prepared for the project. Please direct any questions and all future correspondence to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,

ELIZABETH A. CHEADLE
Chairperson